

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**TRAXCELL TECHNOLOGIES, LLC,**

*Plaintiff,*

**v.**

**GOOGLE LLC,**

*Defendant.*

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**Civil Case No. 6:21-cv-00023**

**Hon. Alan D. Albright**

**DECLARATION OF ANDREW Y. CHEN IN SUPPORT OF DEFENDANT'S MOTION  
TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA  
PURSUANT TO 28 U.S.C. § 1404(a)**

I, Andrew Y. Chen state and declare as follows:

1. I am a Group Product Manager for Google Maps and work out of Google LLC's ("Google") Mountain View, California office. I provide this declaration in support of Defendant's motion to transfer the above-captioned action to the United States Court for the Northern District of California. I submit this declaration based upon my knowledge of and investigation related to the location of employees and documents related to Google Maps, which I understand Plaintiff Traxcell Technologies, LLC ("Traxcell") has accused of infringement.

2. Google has been headquartered in Northern California since its founding in 1998. It has been headquartered in Mountain View, California since 2003.

3. Google's Mountain View headquarters is the strategic center of Google's business. Its Mountain View offices and other offices in Northern California (including its Sunnyvale, San Francisco, and San Bruno offices), house thousands of employees, making up

over a third of Google's total worldwide employees, including engineers, product managers, executives, and staff, particularly those performing work related to Google Maps.

4. Decisions related to Google's overall business, including the most significant sales, marketing, design, and release decisions related to Google Maps are made in Northern California by product leads, such as myself, as well as managers and engineering teams.

5. Google Maps was initially developed in Google's Mountain View headquarters, and much of Google Maps' ongoing design, development, and other technical activities takes place in Northern California.

6. Based on my knowledge and investigation to date, at least the following additional Google employees have knowledge and/or managerial responsibility regarding the design, development, and operation of Google Maps:

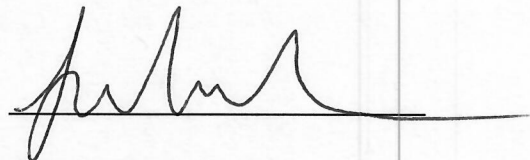
- Myself;
- Smruti Parichha, Software Engineer, is located in Google's Mountain View, California office. Ms. Parichha manages a team of software engineers in Mountain View who are responsible for, among other things, working with the Android Google Maps application, including determining a device's location.
- Lili Cao, Software Engineer, is located in Google's Mountain View, California office. Mr. Cao is responsible for, among other things, working with the iOS Google Maps application, including determining a device's location.
- Stan Chesnutt, Senior Software Engineer, is located in Google's Mountain View, California office. Mr. Chesnutt is responsible for, among other things, working with the technology called the "network location provider," which determines the



location of an Android phone when needed by an application or any system within the phone.

7. Nearly all the documents, such as those generated by managers, project leads, or engineers that relate to the development or operation of Google Maps, including highly confidential proprietary source code, are either physically present in or electronically accessible from Northern California, as that is where the persons most qualified to identify and locate such documents reside.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Mountain View, California on September 18, 2021.



Andrew Y. Chen